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6 Attorneys for Defendant
EXACT STAFF, INC.
7

8 UNITED STATES DISTRICT COURT

9 CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

10 MARIA B. ALONSO, an individual
and on behalf of all others similarly
11 situated,

12 Plaintiff,

13 vs.

14 TARGET CORPORATION, a
Minnesota corporation; EXACT
15 STAFF, INC., a California corporation;
and DOES 1 through 100, inclusive,
16

17 Defendants.
18
19

CASE NO. 5:23-cv-01705 MCS
(SSCx)

**STIPULATION TO DISMISS
ACTION WITHOUT
PREJUDICE**

Removal Date: August 23, 2023
Complaint Filed: April 27, 2023
Trial Date: Not Set

20
21 IT IS HEREBY STIPULATED AND AGREED to by and between Plaintiff
22 Maria B. Alonso (“Plaintiff”), Defendant Target Corporation (“Target”) and
23 Defendant Exact Staff, Inc. (“Exact Staff” and together with Plaintiff and Target
24 referred to herein as the “Parties”), by and through their respective counsel of
25 record, as follows:

26 ///

27 ///

RECITALS

WHEREAS, Plaintiff filed a class action Complaint on April 27, 2023, with the Superior Court of the State of California, County of San Bernardino, alleging the following causes of action: (1) failure to pay overtime wages; (2) failure to pay minimum wages; (3) failure to provide meal periods; (4) failure to provide rest periods; (5) waiting time penalties; (6) wage statement violations; (7) failure to timely pay wages; and (8) unfair competition (the “Action”);

WHEREAS, on August 23, 2023, Target removed the Action to the United States District Court for the Central District of California pursuant to the Class Action Fairness Act; and

WHEREAS, the Parties have agreed to request dismissal of the Action without prejudice so that Plaintiff may pursue her individual claims in arbitration.

Based on the above Recitals, the Parties **HEREBY STIPULATE AND AGREE** that this Action be dismissed in its entirety without prejudice.

Dated: October 06, 2023

BIBIYAN LAW GROUP, P.C.

/s/ Brian Zaghi

By

David D. Bibiyan
Jeffery Klien
Jousha Shirian
Brian Zaghi
Attorneys for Plaintiff
MARIA B. ALONSO

Dated: October 06, 2023

DLA PIPER LLP (US)

/s/ Matthew Riley

By

Julie A. Dunne
Matthew Riley

Attorneys for Defendant
TARGET CORPORATION

1
2 Dated: October 06, 2023

GORDON REES SCULLY
MANSUKHANI, LLP

3 /s/ *Emma R. Horner*

4 By

5 _____
Roger M. Mansukhani
Emma R. Horner

6 Attorneys for Defendant
7 EXACT STAFF, INC.

8 Pursuant to Local Rule 5-4.3.4, I hereby attest that all other signatories listed
9 hereto concur in the content of this filing and have authorized this filing.

10 Dated: October 06, 2023

BIBIYAN LAW GROUP, P.C.

11 /s/ *Brian Zaghi*

12 By

13 _____
David D. Bibiyan
Jeffery Klien
Jousha Shirian
Brian Zaghi
Attorneys for Plaintiff
14 MARIA B. ALONSO
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